

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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DEC - 8 1993

In the Matter of)
)
Policies and Rules Implementing)
the Telephone Disclosure and)
Dispute Resolution Act)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
CC Docket No. 93-22

93-22

REPLY

MCI Telecommunications Corporation (MCI) hereby replies to the comments submitted in response to MCI's petition seeking reconsideration of Section 64.1510(b) of the Commission's rules.

Section 64.1510(b) of the Rules requires common carriers offering billing and collection services in connection with interstate information services provided pursuant to a presubscription or comparable arrangement to include four statements on the bill and to display information service charges separate from local and long distance telephone charges.

In its petition, MCI demonstrated that this rule goes beyond the intent of the Telephone Disclosure and Dispute Resolution Act (TDDRA) because Congress did not intend the pay-per-call service requirements to apply to presubscribed interstate information services. MCI also demonstrated that the rule is not necessary to protect the public interest because all the terms and conditions of service must be provided to consumers as part of the presubscription agreement. In addition, MCI demonstrated that it would be

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costly and burdensome to require carriers to modify billing statements in order to comply with the rule.

No party opposes MCI's request or refutes its arguments and, in fact, Sprint offers further for support MCI's position. Accordingly, based on the record, MCI urges the Commission to reconsider Section 64.1510(b) of its rules and revise it in a manner consistent with the position expressed herein.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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Dated: December 8, 1993

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 8th day of December, 1993, copies of the foregoing "REPLY" in the Matter of Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act in CC Docket No. 93-22, were served by first-class mail, postage prepaid, upon the parties listed on the following attachment.



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